

ORIGINAL

ANDRE S. WOOTEN #3887
ATTORNEY AT LAW
1188 BISHOP STREET
CENTURY SQUARE, SUITE 1909
HONOLULU, HAWAII 96813
TELEPHONE: 808-545-4165

ATTORNEY FOR PLAINTIFF

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAR 13 2007

at 3 o'clock and 10 min. M.
SUE

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

ROBERT SHEREZ;)	Civil No. 04-00390 HG-KSC
)	
Plaintiff,)	PLAINTIFF'S PROPOSED JURY
)	INSTRUCTIONS;
vs.)	CERTIFICATE OF SERVICE
)	
STATE OF HAWAII)	
DEPARTMENT OF EDUCATION;)	
PATRICIA HAMAMOTO,)	
Superintendent of Hawaii)	
Schools; MEREDITH MAEDA,)	
Principal of Castle High)	
School; SARA GRONNER or)	
GRONNA, Vice Principal)	
of Castle High School;)	
)	
Defendants.)	

PLAINTIFF'S PROPOSED JURY INSTRUCTIONS

The Plaintiff ROBERT SHEREZ, through his undersigned attorney of record, Andre S. Wooten, pursuant to the Court's Order, Local Rule 2.16, and Rule 51 of the Federal Rules of Civil Procedure, submits the following proposed jury instructions.

**INSTRUCTIONS REQUESTED TO BE GIVEN TO THE
JURY AT THE START OF THE TRIAL**

1. Opening Instructions - Duty of Jury
2. Statutes Involved - Title VII

3. Role of Plaintiffs in the Enforcement of Title VII
4. Statement of Plaintiff's Claims
5. Order of Trial
6. Evidence in the Case
7. Inferences Defined
8. Court's Questions to Witnesses
9. What is Not Evidence
10. Evidence for Limited Purpose
11. Direct and Circumstantial Evidence
12. Ruling on Objections
13. Credibility of Witnesses
14. Burden of Proof-Preponderance of the Evidence
15. Taking Notes
16. Stipulated Facts
17. Bench Conferences and Recesses
18. Conduct of the Jury

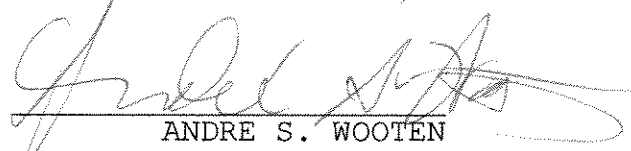
**INSTRUCTIONS REQUESTED TO BE GIVEN TO THE
JURY AT THE CLOSE OF TESTIMONY**

19. Duties of Jury to Find Facts and Follow Law
20. What is Evidence
21. What is Not Evidence
22. Direct and Circumstantial Evidence
23. Credibility of Witnesses
24. Charts and Summaries in Evidence
25. Charts and Summaries not Received in Evidence

26. Employment Discrimination - Defined
27. Types of Racial Discrimination in Hiring Practices
28. Evidence of Racial Discrimination in Hiring Practices
29. Retaliation
30. Proof Beyond Reasonable Doubt Is Not Required
31. Title VII Back Pay
32. Mitigation of Damages
33. Compensatory Damages -- Non-Pecuniary
34. Damages - Front Pay -
35. Punitive Damages
36. Duty to Deliberate
37. Election of Foreperson - Special Verdict
38. Verdict Form - Jury Responsibility
39. Communication With Court
40. No Specific Intent Required
41. Joint liability
42. Hawaii Civil Rights Act

DATED: Honolulu, Hawaii

March 12, 2007


ANDRE S. WOOTEN
Attorney for Plaintiff